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LAW OFFICES
TRAINUM, SNOWDON, HOLLAND, HYLAND & DEANE

A PROFESSIONAL CORPORATION
SUITE 500
888 SEVENTEENTH STREET, N.W.
WASHINGTON, D.C. 20006-3964

(202) 835-0900

JOHN RUSSELL DEANE III
THOMAS W. HOLLAND
JOHN F. HYLAND, JR.
RICHARD W. SNOWDON III
CHARLES A. TRAINUM, JR.
CHRISTOPHER J. KERSTING*

FACSIMILE
(202) 835-0907
CABLE ADDRESS
ADVOCATE

*ADMITTED IN MARYLAND ONLY

September 17, 1990

Deane H. Zeller
District Manager
Salt Lake District, BLM
2370 S. 2300 W.
Salt Lake City, Utah 84119

Re: Comments of SEMA and NHRA Regarding
Issues For Consideration in Upcoming
Study of Bonneville Salt Flats

Dear Mr. Zeller:

During the course of the first meeting of the Bonneville Salt Flats Coalition, it was suggested that members submit comments/suggestions on the Bonneville Salt Flats Study Plan. The following are the comments of the Specialty Equipment Market Association (SEMA) and The National Hot Rod Association (NHRA) (referred to herein as the Associations) submitted in response to your request.

The Associations have as a primary concern the scope of study. We submit that the study must employ all necessary technologies so that at least two questions are answered with data-supported certainty. First, the study results must show whether there is an ongoing net loss of salt from the Salt Flats area. Second, if there is a net loss of salt, the study must show the factors responsible for the salt loss and assign quantities of loss to those factors. It is the position of the Associations that a Study Plan which does not provide methods to obtain these results is fundamentally flawed and will produce a study that is not worth undertaking.

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The reasons for the position set forth above are clear. The various stakeholders involved in the controversy surrounding the future of the Salt Flats all claim legal rights of one sort or another to support their positions on how the Salt Flats area should be used in the future. Therefore, a study which fails to provide data designed to provide certainty leaves the parties in the same morass we appear to confront at present.

Turning to specific issues the Study Plan must address, The Associations assert that the Study should include research on a number of preventative and remedial measures. Primary among these is the concept of introducing Salt from Reilly Industry's evaporation ponds to increase the overall presence of salt on the Flats and to improve the salt crust surface. The Study Plan should also allocate funds and personnel to consider the chemical nature of the brine and the crust. A determination must be made as to whether and how salt from the ponds could be made compatible for use as a supplement to the existing resources on the Salt Flats. Depending on the answers to these questions, the study should evaluate the most effective means to distribute either brine or crystalline mineral on the Salt Flats.

Another concept which dovetails nicely with study-related activities is the idea of surface and subsurface barriers to prevent migration of brine and salt. Because the Study Plan already provides for research on transmissivity and direction of flow, either a model or an isolated portion of the Salt Flats could be used to test the barrier concept. This research could perhaps even enhance the Study by creating a scenario comparing free flow of brine to an area where a barrier impedes the flow. Also, there are other barrier-type concepts which are related to study activities which warrant exploration. One such concept is the reverse gradient barrier method, such as is employed by Reilly to prevent leakage from its evaporation ponds.

Exploring the concepts outlined above during the course of the Study makes good economic and practical sense since much of the personnel, expertise and equipment necessary to research many of these concepts will already be gathered. Furthermore, if the Study shows that salt is being depleted by man's activities in the area, the BLM will be well on the way to taking steps to correct the problem.

The Associations would like to reiterate the importance of including research on the Pilot Valley Playa as a control for the Study. Pilot Valley is an accessible site which provides a useful example of hydrologic and geomorphic systems similar to

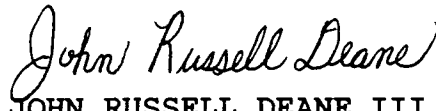
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the Bonneville Salt Flats, but undisturbed by man's activities. As the BLM has noted in its most recent Study Plan, the 1979 U.S.G.S. Study by Lines included much useful information using Pilot Valley as a comparison to the Salt Flats.

In conclusion, the Associations are most concerned that the Study, be comprehensive and absolutely thorough. Corners must not be cut in order to meet a budget if doing so will put the reliability or veracity of the Study into question.

Again, the Associations appreciate the opportunity to comment on the Study Plan. If you have any questions please do not hesitate to contact me or Christopher J. Kersting.

Sincerely,

A handwritten signature in cursive script that reads "John Russell Deane". The signature is written in dark ink and is positioned above the printed name.

JOHN RUSSELL DEANE III